

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

<b>DONNA CURLING, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	<b>CA No. 1:17cv02989-AT</b>
	)	
<b>v.</b>	)	
	)	
<b>BRIAN KEMP, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**RESPONSE OF DEKALB COUNTY DEFENDANTS IN OPPOSITION TO  
COALITION PLAINTIFFS’ MOTION FOR ISSUANCE OF SUBPOENA**

COME NOW Defendant the DeKalb County Board of Registration and Elections, Defendant Erica Hamilton, in her official capacity as director of the DeKalb County Board of Registration and Elections (and successor to Maxine Daniels), and Defendants Michael P. Coveny, Anthony Lewis, Leona Perry, Samuel E. Tillman, and Boaky N. Vu, in their individual capacities and their official capacities as members of the DeKalb County Board of Registration and Elections, (collectively the “DeKalb Defendants”), and file this response in opposition to the Motion of Plaintiffs Coalition for Good Governance, Laura Digges, William Digges III, Megan Missett, and Ricardo Davis (the “Coalition Plaintiffs”) for Issuance of Subpoena. Doc. No. [230].

The DeKalb Defendants show the Court that all data requested to be preserved and produced under the Coalition Plaintiffs' proposed subpoena has been preserved and remains sequestered in a secure location, and that permitting Plaintiffs' requested subpoena would allow them to disregard the stay of discovery that was in effect at the time the DeKalb Defendants were dismissed from this action. Further, the allegations set forth in the Plaintiffs' Motion are unsupported by facts, and there is no proper legal basis for the subpoena requested. In support of this response, the DeKalb Defendants rely upon their Brief in Support hereof, the Declaration of Erica Hamilton, attached to Defendants' Brief as Exhibit "A", and the Declaration of Chris Harvey, attached to Defendants' Brief as Exhibit "B".

Respectfully submitted this 3rd day of July 2018.

HAYNIE, LITCHFIELD & WHITE, PC

/s/Daniel W. White

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**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1**

The undersigned hereby certifies that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, using a font type of Times New Roman and a point size of 14.

/s/Daniel W. White

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 3, 2018, I electronically filed the foregoing RESPONSE OF DEKALB COUNTY DEFENDANTS IN OPPOSITION TO COALITION PLAINTIFFS' MOTION FOR ISSUANCE OF SUBPOENA with the Clerk of Court using the CM/ECF system which will send email notification of such filing to all attorneys of record.

/s/Daniel W. White

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